

Elm City Communities/Housing Authority of the City of New Haven (ECC/HANH) submits testimony in support of Proposed Human Services Committee Bill No. 5357 and respectfully asks that it consider additional legislative changes.

Connecticut's child care subsidy program, Care 4 Kids, is a lifeline for our state's working families. These subsidies enable low- to moderate-income parents to establish the stable child care arrangements that are crucial for their success in the workforce. Care 4 Kids also helps ensure that more than 20,000 of Connecticut's children benefit from consistent child care that supports their healthy development.ⁱ

Elm City Communities/the Housing Authority of the City of New Haven (ECC/HANH), All Our Kin, and the Service Employees International Union (SEIU) applaud the Human Services Committee of the Connecticut General Assembly for including higher education within the definition of employment-related activities as well as extending the Care 4 Kids redetermination period from eight months to one year. It falls in line with the 2011 federal Office of Child Care recommendationⁱⁱ and recent proposed rulemakingⁱⁱⁱ that states adopt a 12 month redetermination period in order to improve children's continuity of care. As a result, twelve-month eligibility has three advantages: first, children benefit from the stable care that research has demonstrated is essential for healthy development;^{iv} second, fewer eligible families are excluded from the program because of administrative burdens associated with redetermination; and third, reduced redetermination frequency minimizes costly churn of parents cycling in and out of the program.^v However, we hope that the Human Services Committee will also consider the following policy recommendations in order to maximize the impact and efficiency of Care 4 Kids—better supporting parents and child care providers alike—a program that is vital to ECC/HANH families:

1. Streamline the documentation process for establishing eligibility. Burdensome documentation requirements at the point of entry to Care 4 Kids are a barrier to eligible families seeking to access benefits. Since many families are enrolled in multiple benefit programs simultaneously, where possible, documentation should be shared among government programs in which families may be enrolled. For instance, parents who already have information stored in the Department of Social Services System should have that information automatically transferred to their Care 4 Kids program file. Such information-sharing would ease the burden of applying for many eligible families and reduce processing times for all families in the system because of increased efficiency. By eliminating redundancy, such a change also is likely to create substantial cost savings.

2. Allow greater flexibility in eligibility requirements.

- **Allow for a broad definition of “vulnerable populations” within the protective services category.** This category has recently been expanded to include children who are participating in Early Head Start-Child Care Partnerships; it should be expanded to include all children in Head Start or Early Head Start and their siblings, as well as homeless children. Income and employment requirements may be waived for these families, in some cases, reducing administrative burdens and making it easier for families to access care for vulnerable children.^{vi}

- **Eliminate the requirement that subsidized child care hours match parent's work hours.**

Currently, children whose parents have irregular or limited work or training hours receive subsidies only for care during matching hours of the day—a child of a school bus driver might only receive subsidies covering two hours of care in the morning and two hours in the afternoon, for example. Because most providers must fill their child care spaces with full-time children, in practice children who receive limited hours of subsidized care often have limited care options. These matching hours also need to be revisited because many of the parents who use Care 4 Kids rely on the public transit system, and bus schedules make it difficult to transport children to care during matching hours. In addition, this system imposes taxing documentation requirements on parents.^{vii} The State could alleviate this problem by allowing the subsidy to be used for hours that best support children's healthy development, rather than merely for hours when parents are working.

3. Introduce a method for parents to demonstrate presumptive eligibility. The Care 4 Kids system should include an expedited path for parents whose circumstances suggest that they will qualify for care. Following their initial showing of need, perhaps through submission of income tax forms, parents should have a grace period of thirty days during which they receive child care subsidies to provide full documentation of their need. Having access to child care for those thirty days will help unemployed parents succeed in their job searches and secure stable employment and help employed parents maintain their jobs. The state also could experiment with allowing parents who have already demonstrated their eligibility for another benefit program, such as SNAP, Section 8, and public housing, to be presumed eligible. North Carolina, for instance, made eligibility for SNAP benefits presumptive proof of income eligibility for child care subsidies. This method would provide the immediate and necessary supports for parents seeking child care for employment as well as educational purposes. In addition to benefiting low-income families, the state estimates that this policy change saves 15-20 minutes in each parent interview.^{viii}

ⁱ Connecticut Department of Social Services, Care 4 Kids. 2014. "Number of Children Paid by Age Category and Service Setting, February 2014." <http://www.ctcare4kids.com/files/2014/04/February-2014.pdf>.

ⁱⁱ HHS ACF, Office of Child Care (OCC). 2011. "Policies and Practices That Promote Continuity of Child Care Services and Enhance Subsidy Systems, 2011." CCDF-ACF-IM-2011-06. Washington, DC: HHS ACF OCC. <http://www.acf.hhs.gov/programs/occ/resource/im2011-06>.

ⁱⁱⁱ "Child Care and Development Fund Program: A Proposed Rule by the Health and Human Services Department on 05/20/2013." Federal Register. <https://www.federalregister.gov/articles/2013/05/20/2013-11673/child-care-and-development-fund-ccdf-program>.

^{iv} Adams, Gina, and Monica Rohacek. 2010. "Child Care Instability: Definitions, Context, and Policy Implications." Washington, DC: The Urban Institute. <http://www.urban.org/publications/412278.html>.

^v Adams, Gina, and Hannah Matthews. 2013. "Confronting the Child Care Eligibility Maze." Washington, DC: The Urban Institute and CLASP. <http://www.urban.org/UploadedPDF/412971-confronting-the-child-care.pdf>.

^{vi} Ibid.

^{vii} Adams, Gina, and Hannah Matthews. 2013. "Confronting the Child Care Eligibility Maze." Washington, DC: The Urban Institute and CLASP. <http://www.urban.org/UploadedPDF/412971-confronting-the-child-care.pdf>.

^{viii} Ibid.